

IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

RECEIVED

INTRODUCTION

1. At all times material to this Indictment, **DEFENDANT TAMMY MCDONALD** was a registered nurse licensed to work in South Carolina.
2. Specifically, **DEFENDANT** worked as the Director of Nursing Services at a skilled nursing and rehabilitation center in Columbia, South Carolina, which served as a COVID-19 vaccination provider.

THE FEDERAL COVID-19 VACCINATION PROGRAM

3. On or about January 31, 2020, the Secretary of the United States Department of Health and Human Services ("HHS") declared a national public health emergency under 42 U.S.C. § 247d as a result of the spread of a novel coronavirus, SARS-CoV-2, also known as "COVID-19," to and within the United States. On or about March 13, 2020, the President of the United States issued Proclamation 9994 declaring a national emergency beginning on March 1, 2020, as a result of the rapid spread of COVID-19 within the United States. As part of the response to the pandemic, the United States Government provided funding to pharmaceutical and biotechnology companies capable of developing a vaccine for COVID-19.

4. Beginning in December 2020, the United States Food and Drug Administration (“FDA”) began approving vaccines for emergency use. To date, the FDA has authorized three COVID-19 vaccines for use: (1) Pfizer-BioNTech COVID-19 Vaccine; (2) Moderna COVID-19 Vaccine; and (3) Janssen COVID- 19 Vaccine.

5. All COVID-19 vaccines in the United States were purchased by the United States Government for administration exclusively by participating providers through the CDC COVID-19 Vaccination Program. COVID-19 vaccination providers participating in the CDC COVID-19 Vaccination Program are required to sign a CDC COVID-19 Vaccination Program Provider Agreement.

6. The Government also contracted with companies to print official CDC COVID-19 Vaccination Record Cards according to certain CDC specifications and to distribute the cards as part of the vaccine ancillary kits sent to each vaccine distribution location.

7. COVID-19 vaccination providers are required to provide patients with an official CDC COVID-19 Vaccination Record Card. The CDC COVID-19 Vaccination Record Card lists the name of the patient receiving the vaccine, the date of birth of the patient receiving the vaccine, the name of the manufacturer of the COVID-19 vaccine that the patient received, the date the patient received it, the dose numbers, and the location where each dose was administered.

8. An individual’s CDC COVID-19 Vaccination Record Card is used to identify an individual as having been vaccinated against COVID-19 and in many circumstances is required to travel to certain locations; attend certain events where large numbers of people congregate, such as sporting events and concerts; and be employed in certain professional activities.

COUNT 1
(Production of an Identification Document)

THE GRAND JURY CHARGES:

9. Paragraphs 1 through 8 of this Indictment are incorporated herein by reference.
10. On or about June 20, 2021, in the District of South Carolina, **DEFENDANT TAMMY MCDONALD** did knowingly and without lawful authority produce an identification document, authentication feature, and false identification document, that is and appears to be a CDC COVID-19 Vaccination Record Card issued by or under the authority of the United States, and the production of which was in and affected interstate and foreign commerce.

All in violation of 18 U.S.C. §§ 1028(a)(1) and 1028(b)(1).

COUNT 2
(Production of an Identification Document)

THE GRAND JURY FURTHER CHARGES:

11. Paragraphs 1 through 8 of this Indictment are incorporated herein by reference.
12. On or about July 28, 2021, in the District of South Carolina, **DEFENDANT TAMMY MCDONALD** did knowingly and without lawful authority produce an identification document, authentication feature, and false identification document, that is and appears to be a CDC COVID-19 Vaccination Record Card issued by or under the authority of the United States, and the production of which was in and affected interstate and foreign commerce.

All in violation of 18 U.S.C. §§ 1028(a)(1) and 1028(b)(1).

COUNT 3
(Making a False Statement)

THE GRAND JURY FURTHER CHARGES:

13. Paragraphs 1 through 8 of this Indictment are incorporated herein by reference.
14. On or about October 22, 2021, in the District of South Carolina, **DEFENDANT TAMMY MCDONALD** did knowingly and willfully make and cause to be made materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of any department or agency of the United States, that is, **DEFENDANT** stated and represented to Special Agents with HHS and the Federal Bureau of Investigation that she did not have access to CDC COVID-19 Vaccination Record Cards, and that she had never provided inaccurate CDC COVID-19 Vaccination Record Cards to an individual, whereas in truth and fact, as **DEFENDANT** then and there knew, her statements and representations denying such specifics were false, fictitious, and fraudulently made, in that she had access to CDC COVID-19 Vaccination Record Cards and that she provided CDC COVID-19 Vaccination Record Cards to individuals and had personally filled out the individuals' identifying information and lot numbers for vaccines she knew had not been administered to those individuals.

15. All in violation of Title 18, United States Code, Section 1001(a)(2).

A True BILL

[REDACTED]
FOREPERSON

M. Rhett Dehart
M. RHETT DEHART (DAS)
ACTING UNITED STATES ATTORNEY